

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DR. JOSEPH WILSON, Ph.D.,

Plaintiff,

1. -against-

TERRENCE CHENG, DR. PAISLEY
CURRAH, Ph.D., and MARCIA
ISAACSON,

Defendants

15-cv-23 (CBA)(MMH)

**DECLARATION OF
MATTHEW L. BERMAN IN
OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

MATTHEW L. BERMAN, pursuant to 28 U.S.C. §1746, declares under penalty of perjury as follows:

1. I am an attorney admitted to practice before this Court and am a partner of the law firm of Valli Kane & Vagnini LLP, counsel to Plaintiff Dr. Joseph Wilson, Ph.D. in this action.

2. I submit this declaration in opposition to Defendants' motion for summary judgment dismissing Plaintiff's Fourth Amended Complaint in this action, and for the purpose of submitting the following exhibits in opposition of Defendants' motion:

3. Annexed as Exhibit 1 is a true and accurate copy of the transcript of Plaintiff's deposition taken in this action on January 29, 2019.

4. Annexed as Exhibit 2 is a true and accurate copy of the transcript of Plaintiff's continued deposition taken in this action on January 30, 2019.

5. Annexed as Exhibit 3 is a true and accurate copy of the Declaration of Sandy Cooper, dated October 12, 2022.

6. Annexed as Exhibit 4 is a true and correct copy of the transcript of the deposition of Robin Kelley taken in this action on February 19, 2019.

7. Annexed as Exhibit 5 is a true and correct copy of the New York State Office of the Inspector General Investigation of the City University of New York November 2016 Interim Report.

8. Annexed as Exhibit 6 is a true and correct copy of the document marked as Exhibit 3 to the deposition of Stephen Leberstein, taken in this action on March 6, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Garden City, New York, this 12th day of October, 2022.

/s/ Matthew L. Berman
Matthew L. Berman